## UNITED STATES DISTRICT COURT **DISTRICT OF MASSACHUSETTS**

SHEILA PORTER,

Plaintiffs,

V.

Civil Action No. 04-11935-DPW

ANDREA CABRAL, SUFFOLK COUNTY SHERIFF'S DEPARTMENT, SUFFOLK COUNTY, and CORRECTIONAL MEDICAL SERVICES, INC.,

Defendants.

## ASSENTED TO MOTION OF THE UNITED STATES FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS' MOTION TO COMPEL

The United States respectfully moves for an extension of time until August 10, 2005, to respond to the Defendants' Motion to Compel the Production of Testimony and Documents From the Federal Bureau of Investigation. Good cause exists for this Motion.

When the United States was served with Defendants' Motion on July 18, 2005, undersigned counsel was out of the office for over a week for a prior personal commitment until July 26, 2005. Counsel for the Defendants and undersigned counsel had conferred prior to the filing of the motion and agreed that the United States would need additional time to file its response. Accordingly, Defendants' counsel has assented to this Motion.

This Motion is made in good faith and is not made to delay the action, or for any other improper purpose. Therefore, the United States respectfully request that the Court grant this Motion and approve the proposed extension of time for the United States to file its response until August 10, 2005.

Respectfully submitted,

UNITED STATES OF AMERICA

MICHAEL J. SULLIVAN **United States Attorney** 

/s/ Anton P. Giedt By:

Anton P. Giedt

Assistant U.S. Attorneys

1 Courthouse Way

Boston, MA 02210 617-748-3309 (Voice)

617-748-3967 (Fax)

anton.giedt@usdoj.gov

## LOCAL RULE 7.1(A)(2) CERTIFICATION

Undersigned counsel certifies that pursuant to the requirements under Local Rule 7.1(A)(2), he has conferred with Defendants' counsel of record and that Defendants' counsel has assented to this motion.

> /s/ Anton P. Giedt Anton P. Giedt Assistant U.S. Attorney

## CERTIFICATE OF SERVICE

Suffolk, ss.

Boston, Massachusetts DATE: July 29, 2005

I, Anton P. Giedt, Assistant U.S. Attorney, do hereby certify that I have this day served a copy of the foregoing upon the Plaintiffs' counsel of record through electronic filing and by first class mail.

> /s/ Anton P. Giedt Anton P. Giedt Assistant U.S. Attorney

DEFENDANTS' COUNSEL:

Ellen M. Caulo Deputy General Counsel Suffolk Count Sheriff's Department 200 Nashua Street Boston, MA 02114 617-989-6681 (Voice) 617-989-6693 (Fax)

PLAINTIFF'S COUNSEL:

Joseph F. Savage Goodwin Procter, LLP Exchange Place Boston, MA 02109 617-570-1204 (Voice) 617-523-1231 (Fax)

AGENCY COUNSEL:

Frank Davis Damon Katz Federal Bureau of Investigation **Division Counsel** One Center Plaza, Suite 600 Boston, MA 02108